

Deutch v. United States, 367 U.S. 456, 470 (1961) (taking judicial notice of the mileage between Ithaca, NY and Albany, NY); *Boyce Motor Lines v. United States*, 342 U.S. 337, 344 (1952) (“[w]e may, of course, take judicial notice of geography”).

Given the foregoing, and the trial testimony to date concerning certain supposed car travel, the United States respectfully requests that the Court take judicial notice of the above two facts.

Respectfully submitted,

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By: /s/ William F. Abely
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Date: December 11, 2018

CERTIFICATE OF SERVICE

This is to certify that I shall cause a copy of the foregoing document to be served on counsel to Defendants via ECF.

/s/ William F. Abely
WILLIAM F. ABELY
Assistant U.S. Attorney

Dated: December 11, 2018

RULE 7.1 CERTIFICATION

This is to certify that counsel to the United States has conferred with opposing counsel and have attempted in good faith to resolve or narrow the issue.

/s/ William F. Abely
WILLIAM F. ABELY
Assistant U.S. Attorney

Dated: December 11, 2018